



BOARD OF SUPERVISORS

COUNTY OF HUMBOLDT

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July 21, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman and Commissioners:

The Board of Supervisors for Humboldt County California respectfully urges the Federal Communications Commission (FCC) to deny approval of the proposed Altice acquisition of Suddenlink [WC Docket No. 15-135] because the transaction fails to meet the public interest standard. At minimum the FCC must require consumer protections and specific public benefits as enforceable conditions of approval.

Altice's purchase of controlling interest in Suddenlink will transfer private ownership for essential communications infrastructure to even more distant owners, which we believe is against the public interest. From experience we know that consolidated absentee ownership reduces competition, threatens media localism and harms information diversity.

In April 2014, Suddenlink ended their local cable franchise agreement and began operating under a State issued cable franchise. In August 2014, Suddenlink was informed that they are out of compliance with local ordinances adopted by the County of Humboldt and the Cities of Eureka, Arcata, Fortuna, Rio Dell, Ferndale and Blue Lake, California which all require payment of public, education and government access (PEG) fees totalling 3% of video revenue.

We note from FCC's Public Notice released on June 24, 2015 that Altice maintains that the transaction will "accelerate network investment while maintaining a superior level of reliability and customer support." But we fail to see how their experience in Europe and the Dominican Republic provides adequate assurance of their compliance with local ordinances in California.

Based on Suddenlink's resistance to meeting local needs and interests, we ask that the FCC require full compliance with local ordinances in Humboldt County. And should the FCC decide to approve this proposed transaction, which we oppose on principle, we request that the FCC take this opportunity to address these concerns by ordering that Altice/Suddenlink and other entities involved meet four basic requirements:

- **Promote Universal Access** with investments in new infrastructure for our least served people and places;
- **Ensure Localism** with meaningful support for PEG access and roles for local, state and tribal jurisdictions;
- **Protect Open Internet** with strong net neutrality requirements for common carriage and non-discriminatory interconnection; and,
- **Extend Broadband Adoption** by providing substantial free connections and at-cost support for low income communities and community anchor institutions including schools, libraries, health providers, public media and civic organizations. Altice/Suddenlink must be required to:
 - Include all low-income households in adoption plans and programs;
 - Set high performance goals for network symmetry, latency and speeds;
 - Fund and support community media and broadband access through Tribes, States and Local Governments;
 - Establish mechanisms for local participation in affected communities; and,
 - Offer stand-alone internet service without data caps that is subject to local accountability and enforceable net neutrality rules.

We request that the FCC take a more active oversight role while also supporting state and local jurisdictions to ensure universal access to open Internet and local community media so that the benefits of digital information are delivered to low-income families and community anchor institutions in a more meaningful way.

Absentee ownership of communications infrastructure, such as this Altice/Suddenlink transaction, creates a real need for specific and locally enforceable public interest obligations. Lacking proper regulatory oversight, experience shows that Altice, Suddenlink and other communication utility owners will fail to deliver adequate service to meet local needs and community interests.

Sincerely,



Estelle Fennell, Chair
Humboldt County Board of Supervisors

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